

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA
CASE NO. 08-060702 CACE (07)
CASE NO. 09-01853 CACE (07)
(CONSOLIDATED)

MATTHEW ABERCROMBIE, et al.,

Plaintiffs,

v.

SB HOTEL ASSOCIATES, LLC,
BAYROCK GROUP, LLC,
DONALD TRUMP, ROY STILLMAN,
CHICAGO TITLE INSURANCE
COMPANY and CORUS BANK, N.A.,

Defendants.

-----/

VIDEO DEPOSITION OF CARINA RADONICH

TAKEN ON BEHALF OF THE PLAINTIFFS

JUNE 3, 2013

2:07 p.m. to 3:50 p.m.

LAW OFFICES OF JOSEPH E. ALTSCHUL, LLC
2717 WEST CYPRESS CREEK ROAD
FORT LAUDERDALE, FLORIDA 33309

REPORTED BY:
JESSICA COOPER, COURT REPORTER
NOTARY PUBLIC, STATE OF FLORIDA



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4	<p>1 INDEX TO EXHIBITS</p> <p>2 PLAINTIFF'S DESCRIPTION PAGE</p> <p>3 EXHIBIT</p> <p>4 681 Letter written by Maritza Meza 35</p> <p>5 682 A copy of The Galleria 56</p> <p>6 Collection of Fine Homes</p> <p>7 business card with</p> <p>8 Ms. Radonich's handwriting</p> <p>9 683 Bullet that the director of 57</p> <p>10 sales prepared to send to the</p> <p>11 clients</p> <p>12 684 Document with Ms. Radonich's 58</p> <p>13 handwriting</p> <p>14 685 Document with Ms. Radonich's 61</p> <p>15 handwriting</p> <p>16 686 Document with Ms. Radonich's 61</p> <p>17 handwriting</p> <p>18 687 Document with Ms. Radonich's 62</p> <p>19 handwriting</p> <p>20 688 The same as the last page of 63</p> <p>21 Exhibit 139</p> <p>22 689 Temporary brochure 66</p> <p>23 690 Document with Ms. Radonich's 69</p> <p>24 name and signature</p> <p>25 691 An article from a magazine 71</p> <p>692 Facsimile 73</p>

3	<p>1 INDEX OF EXAMINATION</p> <p>2 WITNESS: Carina Radonich</p> <p style="text-align: right;">Page</p> <p>3 DIRECT EXAMINATION</p> <p>4 By Joseph E. Altschul, Esq. 6</p> <p>5 CROSS-EXAMINATION</p> <p>6 By Herman J. Russomanno III, Esq. 89</p> <p>7 CROSS-EXAMINATION</p> <p>8 By Patrick J. Rengstl, Esq. 91</p>
5	<p>1 VIDEO DEPOSITION OF CARINA RADONICH</p> <p>2 JUNE 3, 2013</p> <p>3 THE COURT REPORTER: We're now on the video</p> <p>4 record. Today's date is June 3rd, 2013 and the</p> <p>5 time is 2:07 p.m. This is the video deposition of</p> <p>6 Carina Radonich taken in the matter of Matthew</p> <p>7 Abercrombie, et al. v. SB Hotel, et al., Case No.</p> <p>8 08-060702 CACE (07) and 09-01853 CACE (07).</p> <p>9 We are located at 2717 West Cypress Creek Road,</p> <p>10 Fort Lauderdale, Florida 333 -- what's the ZIP</p> <p>11 code?</p> <p>12 MR. ALTSCHUL: 09.</p> <p>13 THE COURT REPORTER: -- 09. The digital</p> <p>14 court reporter is Jessica Cooper with the firm</p> <p>15 Universal Court Reporting. Would counsel please</p> <p>16 introduce themselves for the record?</p> <p>17 MR. ALTSCHUL: I am Joseph Altschul here on</p> <p>18 behalf of the plaintiffs.</p> <p>19 MR. RUSSOMANNO: Good afternoon.</p> <p>20 Herman Russomanno on behalf of Donald Trump.</p> <p>21 MR. RENGSTL: Patrick Rengstl on behalf of</p> <p>22 Corus Construction Venture.</p> <p>23 MR. CHARLIP: David Charlip on behalf of the</p> <p>24 deponent.</p> <p>25 Thereupon:</p>

6

1 CARINA RADONICH,
 2 having been first duly sworn, testified as follows:
 3 DIRECT EXAMINATION
 4 BY MR. ALTSCHUL:
 5 Q Please state your name.
 6 A Carina.
 7 Q And your last name.
 8 A Radonich.
 9 Q Radonich. And would you prefer to be called
 10 Carina or Ms. Radonich?
 11 A Carina.
 12 Q Carina. Okay. Right. Carina, my name is
 13 Joseph Altschul, I represent the plaintiffs in this
 14 case. The plaintiffs are a group of approximately 81
 15 people who purchased, approximately, 53 units in the
 16 project that was to be known as the Trump International
 17 Hotel and Tower in Fort Lauderdale. We are taking
 18 depositions in this case of people who may have
 19 knowledge of facts in the case. And that's the reason
 20 why you've been served with the subpoena, and let me
 21 ask you that on the record. You have been served with
 22 the subpoena to be here today, correct?
 23 A Yes. It was a very bad experience because
 24 the guy was so disrespectful, really, I mean it was very
 25 bad days for me. Never have something like this

7

1 before.
 2 Q Okay. Well, I'm -- I'm sorry that that was a
 3 bad experience. I certainly tried to work it in a way
 4 that it wouldn't be such a bad experience, but,
 5 ultimately, that's where you left it. So, I'm going to
 6 ask you a series of questions today. And what I would
 7 ask is -- strike that. Have you ever had your
 8 deposition taken before?
 9 A Never.
 10 Q First time ever?
 11 A First time in my life.
 12 Q Okay. So, I'm going to be asking you
 13 questions and then afterwards, the other attorneys may
 14 ask you questions as well. And what I want you to do
 15 is make sure you wait for me to finish my question
 16 before you start to answer. And then if you don't
 17 understand my question, tell me that you don't
 18 understand so that I can try and rephrase the question.
 19 If you're not sure of what I mean in my question -- if
 20 you don't say something, I'm going to assume you know
 21 what I mean. Now, when you answer the questions, you
 22 have to answer audibly. You -- you can't nod your head
 23 because the court reporter can't take that down. Even
 24 though we do have a videotape --
 25 A Speak slowly.

8

1 Q Okay.
 2 A Because English is not my native language.
 3 Q Okay. Sure. So, if I'm speaking too fast,
 4 tell me as well so that I can slow down my questions.
 5 And if you answer a question, I'm going to assume that
 6 you understood it. So, that's why if you don't
 7 understand that I ask that you tell me that you don't
 8 understand it. And then each time when you answer,
 9 again, you're going to have to give an audible answer
 10 such as "yes", "no", "I don't know", "I don't
 11 remember". Because when you nod your head, even though
 12 it's on the camera, the court reporter can't take it
 13 down for the transcript purposes. So, you know, at
 14 times, if you slip and say "uh-huh" or "uh-uh", you
 15 know, one of the lawyers might say, "You have to say
 16 'yes'". We're not saying that to be rude, we're saying
 17 it because we want to be sure that the transcript is
 18 taken completely. Do you --
 19 A Okay.
 20 Q -- understand everything so far?
 21 A Yes.
 22 Q Okay. If you would please -- what language -
 23 - you said that English is not your --
 24 A Spanish.
 25 Q English is not your native language?

9

1 Spanish is your native language? Yes?
 2 A Correct. I'm from Argentina.
 3 Q Okay. So, yes, Spanish is your native --
 4 A Yes. Spanish.
 5 Q Could you speak any other languages other
 6 than English and Spanish?
 7 A No.
 8 Q Okay. I'd like you to share with me your
 9 educational background going back to the time that you
 10 finished high school.
 11 A My education background?
 12 Q Yes.
 13 A I went to the university for two years and a
 14 half. Law university, but in Argentina. Law
 15 university. And after I get married and, you know, I
 16 did real estate course here in the United States and
 17 get my license, and that's my -- my -- my background.
 18 Q Did you graduate from college?
 19 A No. College --
 20 Q University.
 21 A No. I make like two years and a half. Almost
 22 three years before I get married.
 23 Q Which university?
 24 A University -- North University in Argentina.
 25 Q And where is that?



10	<p>1 A It's in Corrientes.</p> <p>2 Q Okay. When did you come to the United States</p> <p>3 to -- to live?</p> <p>4 A '98.</p> <p>5 Q 1998? And have you resided in the United</p> <p>6 States since 1998?</p> <p>7 A Yes.</p> <p>8 Q Okay. When did -- what years did you attend</p> <p>9 the university?</p> <p>10 A Oh, it was in '90- -- '93, '92, '91. I get</p> <p>11 married in 1994, so many years ago.</p> <p>12 Q If you would, please, walk me through the</p> <p>13 types of job that you've worked since you left the</p> <p>14 university.</p> <p>15 A The type of work? I -- well, I always worked</p> <p>16 following my husband. My husband is an engineer. And,</p> <p>17 you know, we get married. We -- we have been boyfriend</p> <p>18 and girlfriend forever, and we get married. Then I</p> <p>19 moved to Chile. And after Chile, I get -- moved to the</p> <p>20 United States. And in the United States, I was, you</p> <p>21 know, managing a Bal Harbour Shops place like a fashion</p> <p>22 and -- and after that, I get my real estate license,</p> <p>23 and I start working doing general real estate. And --</p> <p>24 and after, I enter in -- in the developer.</p> <p>25 Q Ball Harbour Shops, were you the manager of</p>	12
11	<p>1 the shopping mall? You have to say "yes" or "no".</p> <p>2 A Yes.</p> <p>3 Q And how long were you the manager of the</p> <p>4 shopping mall at Bal Harbour Shops?</p> <p>5 A Like six years.</p> <p>6 Q For approximately, from when to when, what</p> <p>7 years?</p> <p>8 A I don't remember. But, approximately, six</p> <p>9 years in total.</p> <p>10 Q Okay. And would you have started that when</p> <p>11 you came to the United States in 1998?</p> <p>12 A Yes. I don't remember exactly, but, you</p> <p>13 know, yes.</p> <p>14 Q Okay. And then you said you went from Bal</p> <p>15 Harbour Shops to general real estate. What -- you have</p> <p>16 to say "yes" or "no".</p> <p>17 A Yes.</p> <p>18 Q Okay. What is general real estate?</p> <p>19 A A general like -- you know, general real</p> <p>20 estate.</p> <p>21 Q Does that mean, you were --</p> <p>22 A Doing general real estate, selling houses,</p> <p>23 condominiums, all that stuff.</p> <p>24 Q Okay. Would you agree you were a residential</p> <p>25 real estate agent?</p>	13
10	<p>1 A Yes.</p> <p>2 Q Are you licensed a real estate agent?</p> <p>3 A Yes.</p> <p>4 Q Are you licensed as a broker?</p> <p>5 A No.</p> <p>6 Q What year did you obtain your real estate</p> <p>7 license?</p> <p>8 A No, I don't remember.</p> <p>9 Q Okay.</p> <p>10 A I don't remember the year exactly.</p> <p>11 Q Approximately, how long did you work in</p> <p>12 general real estate?</p> <p>13 A I don't remember exactly -- exactly. No, I</p> <p>14 don't remember.</p> <p>15 Q Okay. Well, let -- lets go -- let's maybe</p> <p>16 come forward and go backward, maybe that will make it</p> <p>17 easier. How are you currently employed?</p> <p>18 A Where I am right now?</p> <p>19 Q Yes.</p> <p>20 A I'm working with my husband --</p> <p>21 Q Okay.</p> <p>22 A -- right now.</p> <p>23 Q What's the name of the business that you work</p> <p>24 at?</p> <p>25 A A construction company.</p>	12
11	<p>1 Q Okay. Are you no longer working as a real</p> <p>2 estate agent?</p> <p>3 A I'm just showing, you know, a project like</p> <p>4 two months ago. Two months ago again.</p> <p>5 Q Two months ago, you were working as a real</p> <p>6 estate agent?</p> <p>7 A Yes. But, you know, I wasn't really actively</p> <p>8 working.</p> <p>9 Q Okay. Is your license --</p> <p>10 A No.</p> <p>11 Q Is your license active?</p> <p>12 A Always was active, but, you know, I was</p> <p>13 really helping with my husband because I have kids and</p> <p>14 not actively working --</p> <p>15 Q Do you --</p> <p>16 A -- as a real estate.</p> <p>17 Q Is your license active with the real estate</p> <p>18 broker?</p> <p>19 A Yes.</p> <p>20 Q Who was the broker that your license is</p> <p>21 active with?</p> <p>22 A Right now?</p> <p>23 Q Right now.</p> <p>24 A Venegas International Group.</p> <p>25 Q Would you spell that, please?</p>	13



14

1 A Venegas, V-E-N-E-G-A-S.
 2 **Q International Group?**
 3 A Yes.
 4 **Q And where's Venegas located?**
 5 A Biscayne Boulevard. 888 Biscayne Boulevard.
 6 **Q How long have you been -- had your license**
 7 **with Venegas --**
 8 A Two months.
 9 **Q You have to let me finish my questions.**
 10 A Yes.
 11 **Q Even if you think you know the answer, just**
 12 **so that the record is clear, we can only talk one at a**
 13 **time. How long have you had your license with Venegas?**
 14 A Two months.
 15 **Q Who did you have your license with before**
 16 **Venegas?**
 17 A Miami -- I -- I don't even remember exactly
 18 the name because, you know, I wasn't really active, it
 19 was a friend of mine and I just, you know, hold a
 20 license.
 21 **Q Okay. What's the friend's name?**
 22 A Marcella -- Marcella -- I don't remember.
 23 It's -- what's the last name. It's Miami Best
 24 Property, that's the name of the company.
 25 **Q Miami Best Properties?**

15

1 THE COURT REPORTER: Is that a "yes"?
 2 A Properties.
 3 **Q (By Mr. Altschul) Yes? You said "mm-hmm"**
 4 **that's why she was asking you.**
 5 A Yes.
 6 **Q How long was your license active with Miami**
 7 **Best Properties?**
 8 A Two years.
 9 **Q So, from --**
 10 A Two years, one year and a half, something
 11 like that.
 12 **Q So, from approximately 2000- --**
 13 A No, because remember that I wasn't really
 14 active, so I have the -- I never put my license down or
 15 inactive, but, you know, I wasn't -- I was really
 16 helping my husband. And I help and assisting my kinds
 17 only. No working in real estate. After I finish --
 18 like since 2007, after I finished Trump project, I
 19 never, you know, really, was active in real estate
 20 because, you know, I decide to assist -- help my
 21 husband.
 22 **Q In your last response, you said since the**
 23 **Trump project. Which Trump project are you referring**
 24 **to?**
 25 A The one that you called me today, Trump

16

1 International Hotel and Tower in Fort Lauderdale, that
 2 was the name of the project.
 3 **Q Did you work on any other Trump projects**
 4 **besides --**
 5 A No.
 6 **Q And I'll just call it "the project", besides**
 7 **the project?**
 8 A No.
 9 **Q When were you last working actively on the**
 10 **project?**
 11 A In the Trump International?
 12 **Q Yes, in Trump International. Anytime I say**
 13 **"the project", I'm referring to Trump International**
 14 **Hotel and Tower, Fort Lauderdale.**
 15 A I don't remember exactly. It was so much
 16 time. I know it was like at 2004, 2005, something
 17 around that.
 18 **Q Okay. So, you think from 2004, 2005, until**
 19 **now, you have not worked actively as a real estate**
 20 **agent; is that correct?**
 21 A Actively like -- not for a develop employee,
 22 we have like a, you know, some -- I mean, some
 23 transactions but that not -- like not all the time.
 24 Most isolated transaction, I guess.
 25 **Q Okay. Do you know how long you worked for --**

17

1 **on the Trump International project?**
 2 A How long?
 3 **Q Yes.**
 4 A I don't know. It was one year or something
 5 like that, approximately.
 6 **Q Approximately, one year?**
 7 A Yeah.
 8 **Q Okay. How did you come to work on the Trump**
 9 **project?**
 10 A I was called by Maritza Meza which was the
 11 director of sales and Galleria Collection of Fine Homes
 12 which was the broker.
 13 **Q Were you with -- did you have your license**
 14 **with the Galleria Collection of Fine Homes --**
 15 A Correct.
 16 **Q -- before you started working on the Trump**
 17 **project?**
 18 A No.
 19 **Q Because you were working someplace else?**
 20 A Correct.
 21 **Q And do you recall where that was?**
 22 A No, I don't recall exactly.
 23 **Q Okay. Were you working as a real estate**
 24 **agent at that time?**
 25 A I think I was, you know, having -- probably

18

1 RE/MAX but I -- I don't remember. I don't remember.
 2 **Q Okay. How do you know Maritza Meza?**
 3 A How do you know? Because it was -- it was --
 4 how I know? She was the director of sales.
 5 **Q No, how do you know her though?**
 6 A She was like a sister of a person like we
 7 know each other. It wasn't really close to me but, you
 8 know, it was her sister, so I heard that they were
 9 taking -- you know, interviewing sales people for the
 10 project and I did the interview and it was plenty of
 11 people, you know, for the job, and I got selected.
 12 **Q And how did you hear that there were**
 13 **interviews being taken for the project?**
 14 A For the Trump? Because, you know, in real
 15 estate market, you know, for example, there are more
 16 project. They are taking, you know, people or
 17 different developers, you know, people knows.
 18 **Q Was Maritza Meza the person you interviewed**
 19 **with?**
 20 A It was Maritza and it was Paul McCrae which
 21 was the broker, because, you know, the license is to be
 22 under the broker company.
 23 **Q Did you know Maritza or Paul before your**
 24 **interview for the project?**
 25 A No.

19

1 **Q And so, you came to an interview and that's**
 2 **where you met Maritza and Paul?**
 3 A No. Paul, at the first, Maritza. Remember I
 4 told you that it was a person that was related. In the
 5 middle, Patricia Meza which was, you know, her sister
 6 and other friends and people. So, I know -- I wasn't
 7 close friends but I know like a -- you know, when you
 8 know somebody from far.
 9 **Q Did Maritza asked you to come interview for**
 10 **the position at Trump?**
 11 A Maritza in person, no. I heard and I went
 12 and I called in myself and asked if I can get an
 13 interview.
 14 **Q Okay. And so, you interviewed with both**
 15 **Maritza and Paul, and then you were offered the job,**
 16 **correct? Yes?**
 17 A Yes.
 18 **Q Okay. Do you recall when that was?**
 19 A No.
 20 **Q Okay. Do you know whether presales had**
 21 **already begun at the project?**
 22 A Exactly the time, no, I don't remember.
 23 **Q Okay. And your understanding was Maritza**
 24 **Meza was the director of sales?**
 25 A Yeah.

20

1 **Q Okay. I'm going to ask you the names of some**
 2 **other people and I just -- to find out who you knew and**
 3 **what their role was. Do you know Rosemarie Friedman?**
 4 A Yes.
 5 **Q Who's Rosemarie Friedman?**
 6 A She was the other salesperson that was doing
 7 the sales.
 8 **Q Okay. The other salesperson besides you? You**
 9 **have to say "yes" or "no".**
 10 A Yes.
 11 **Q Okay. Was it just the two of you?**
 12 A Yes.
 13 **Q Okay. So --**
 14 A And Maritza Meza. She was selling also.
 15 **Q So, there was Rosemarie, Carina, and Maritza**
 16 **Meza at sales people.**
 17 A Yes.
 18 **Q And --**
 19 A And we are not in -- usually, the director is
 20 -- she -- we were showing all the sales like a pool.
 21 So, it wasn't really -- yeah, we were changing all as a
 22 team.
 23 **Q Do you know Sherry Boylan?**
 24 A Sherry Boylan, yes.
 25 **Q Who's Sherry Boylan?**

21

1 A She was working in Galleria Collection of
 2 Fine Homes.
 3 **Q Is -- and that's where you went to work,**
 4 **correct?**
 5 A Correct.
 6 **Q Did she also work on the Trump project?**
 7 A She -- I think she was working in
 8 administrative position or something like that.
 9 **Q She was not a sales person?**
 10 A No.
 11 **Q Do you know Jim Shambo?**
 12 A Jim Shambo, he was -- he was another agent in
 13 Galleria.
 14 **Q Was he one of the sales people for this**
 15 **project?**
 16 A No.
 17 **Q And who's Paul McCrae?**
 18 A The broker.
 19 **Q When's the last time you spoke with Paul**
 20 **McCrae?**
 21 A Long time ago because he -- he closed the
 22 company and I don't know anything.
 23 **Q Have you had any communication with Paul**
 24 **since he closed the company?**
 25 A No, no communication.

22

1 **Q At all?**
 2 A No, he -- I think -- you know, I heard right
 3 now that he was, you know, in town but I -- I also hear
 4 that he was in Costa Rica, so I don't know exactly.
 5 **Q Okay. But you've not had any -- any either**
 6 **voice conversation or e-mail conversation or any other**
 7 **communication with Paul since he closed the company; is**
 8 **that correct?**
 9 A Since he closed the company, not that voice
 10 communication, not a telephone communication, he sent
 11 an e-mail to the company, Venegas, saying that -- that
 12 he was working or joining and he was talking very high
 13 about, our performance.
 14 **Q So, he was looking to become an agent with**
 15 **Venegas?**
 16 A No, no, no, no.
 17 **Q Okay.**
 18 A He just communicate and have a meeting with
 19 the broker in Venegas.
 20 **Q Okay. Was he giving a reference for you, a**
 21 **recommendation for you.**
 22 A I never request any reference, he was, you
 23 know -- because, you know, when we are -- remember I
 24 mentioned that I was working in this project, we were
 25 sent e-blast. You know, e-blast reach many agents, so

23

1 people sometimes know more.
 2 **Q Who's Kim Lebron (phonetic)?**
 3 A Kim Lebron is another agent of Galleria
 4 Collection.
 5 **Q Do you know Melanie Schrand?**
 6 A Other agent in Galleria Collection.
 7 **Q Do you keep in communication with any of the**
 8 **names that I've asked you so far?**
 9 A No.
 10 **Q How about Maritza Meza?**
 11 A I don't.
 12 **Q When was your last communication with Maritza**
 13 **Meza?**
 14 A 2005, 2006, I'm not -- when they're finished.
 15 **Q You're not friends with -- with her?**
 16 A No.
 17 **Q Okay. Well, Brian Brooksbank, do you know**
 18 **Brian?**
 19 A I don't remember who is -- I don't know who
 20 he is.
 21 **Q Do you know Melissa Winnick?**
 22 A Melissa Winnick. Melissa Winnick was an --
 23 in administrative or something like that.
 24 **Q She was with Galleria Collection?**
 25 A Yes.

24

1 **Q Do you know Marla Zitek?**
 2 A It was a realtor or broker or something like
 3 that but not related with Galleria, it was an outside
 4 agent.
 5 **Q Did you work with her on one or more deals on**
 6 **this project?**
 7 A It wasn't really me, it was more Rosemarie
 8 close realtor. But since we were showing, you know,
 9 the pool, like a sales, so -- I didn't have too much
 10 communication with that agent.
 11 **Q Do you know Kristin Linger?**
 12 A Kristin --
 13 **Q Linger.**
 14 A No, I don't know.
 15 **Q How about Patricia Salerno?**
 16 A Patricia -- it was another agent in Galleria.
 17 **Q And how about Patricia Pradera?**
 18 A She was working with the person like
 19 assistant, Maritza Meza's assistant.
 20 **Q As an agent working on this project, did you**
 21 **frequently work with outside agents as well?**
 22 A Again?
 23 **Q Did you work -- frequently work with other**
 24 **agents who were not part of Galleria Collection in**
 25 **relation to sales in the Trump project?**

25

1 A I don't understand the question.
 2 **Q Okay. Do you know Andy Weiser?**
 3 A Andy Weiser, he's a realtor, very well-known.
 4 **Q Was he involved with this project as well?**
 5 A I don't know. I don't think so.
 6 **Q Okay. So, you never worked with Andy in**
 7 **relation to the Trump project?**
 8 A No.
 9 **Q How about Joel Green? Do you know Joel**
 10 **Green?**
 11 A I know and he was an agent, like outside
 12 agent.
 13 **Q Did you ever work with Joel Green in relation**
 14 **to this project?**
 15 A I don't remember if he has a unit or not, but
 16 he was calling and, you know, asking information or --
 17 I don't know if he sold. I don't -- I don't remember.
 18 **Q Okay. Do you know Donald Trump?**
 19 A Yes.
 20 **Q Okay. Have you met with Donald Trump?**
 21 A Yes.
 22 **Q How many times.**
 23 A Social events, two times.
 24 **Q Okay. Can you tell me what you recall about**
 25 **those events?**

26

1 A It was a social event like a project and, you
 2 know, the -- you know real estate related.
 3 **Q Was it related to this project?**
 4 A One, yes.
 5 **Q Okay. And tell me about that one.**
 6 A That was an event for the project and he was
 7 there.
 8 **Q Okay. And where is there?**
 9 A I don't remember the place because I'm not
 10 too familiar with Fort Lauderdale.
 11 **Q It was in Fort Lauderdale?**
 12 A Yeah.
 13 **Q Okay. And was Roy Stillman there as well?**
 14 A Yes.
 15 **Q Okay. And you've met Roy Stillman before?**
 16 A Yes.
 17 **Q How many times have you met Roy Stillman?**
 18 A Not too many, three.
 19 **Q And was the occasion for each of those social**
 20 **events as well?**
 21 A Yes.
 22 **Q And you never met with Roy Stillman for**
 23 **business relating to this project?**
 24 A The point is that I was closely working with
 25 Maritza Meza and following instructions. And the rest,

27

1 you know, they are developers, broker, and director of
 2 sales. I wasn't the -- that's why -- you know, I
 3 wasn't really the important person there. So, they
 4 were having all the meetings with developers and
 5 between them. I don't know internal -- you know, I was
 6 just following instructions.
 7 **Q Okay. So -- and your instructions came from**
 8 **Maritza Meza?**
 9 A Correct.
 10 **Q Okay. But you think you met with Roy**
 11 **Stillman three times, approximately.**
 12 A Yes, yes.
 13 **Q And each was at social event.**
 14 A It was social event. And one time, we said
 15 "hello" because he was in Galleria.
 16 **Q How many times did you meet Roy Stillman in**
 17 **the Galleria?**
 18 A I don't remember.
 19 **Q Okay. Did you ever see Donald Trump in the**
 20 **Galleria?**
 21 A No.
 22 **Q How about Armen Boyajian?**
 23 A I don't know who he is.
 24 **Q You don't know this name? Do you know Senada**
 25 **Adzem?**

28

1 A Senada Adzem, yes.
 2 **Q Senada. Who's Senada?**
 3 A Senada, I don't know exactly the charge that
 4 she has, but she was coming from New York and assisted
 5 the day of event.
 6 **Q The day of the event.**
 7 A The event. The event. That event that we
 8 socialize.
 9 **Q Are you talking the event with Wyclef Jean?**
 10 A Who?
 11 **Q Do you know who Wyclef Jean is?**
 12 A Oh, yes.
 13 **Q Is that the same event?**
 14 A Correct.
 15 **Q Okay. And so, did you meet with Senada in**
 16 **connection with the event where Wyclef Jean performed?**
 17 A Correct.
 18 **Q Did you speak with her prior to that event or**
 19 **only at that event?**
 20 A No, prior. I was, you know, there and she
 21 was -- she was coming two or three times from New York
 22 and I don't know exactly the charge, to be honest with
 23 you, or what it was, her charge.
 24 **Q Do you know who she worked for?**
 25 A Not exactly.

29

1 **Q Okay. Do you know Michelle Conte?**
 2 A Michelle Conte, yes.
 3 **Q Okay. What do you know about Michelle Conte?**
 4 A Michelle Conte, she was coming from New York
 5 also and she was having all the meeting more with, you
 6 know, Galleria office and she -- I think she was
 7 working from New York. But I don't -- you know, I
 8 wasn't in a position to request information on who was
 9 each of them. So, it wasn't -- you know, it was just,
 10 you know, in the back office and they were doing all
 11 the stuff in front. So --
 12 **Q Did you ever speak with Michelle Conte?**
 13 A Yes.
 14 **Q What did you speak about?**
 15 A I think she was in charge of the rental
 16 program or something around that, something related the
 17 rental program. So, we can -- we never speak about
 18 anything regarding any rental program, any Trump,
 19 nothing. She was the one that was handling those
 20 questions.
 21 **Q Questions regarding the rental program.**
 22 A Questions, correct. We never thought -- we
 23 were handling only the real estate side.
 24 **Q Okay. And the rental program was not part of**
 25 **the real estate side?**

30

1 A But we never -- we never were allowed and
 2 approve and we have not -- we never spoke about the
 3 rental program.
 4 **Q Were you told not to speak about the rental**
 5 **program?**
 6 A Well, you know, I was -- I have a script
 7 following direction with Maritza Meza which was a
 8 director of sale, we have to save. And you know who it
 9 was, you have to follow instructions.
 10 **Q Okay. So, Maritza gave you a script?**
 11 A A script. How do you -- can I explain? You
 12 know, you have a -- you have a property and you have --
 13 how many units, location, developer, and -- and, you
 14 know, three bedrooms, two bedrooms, square-footage,
 15 those type of, you know, info- -- that type of
 16 information.
 17 **Q With the information, all of the topics that**
 18 **you just talked about, the square-footage, number of**
 19 **units, how did you know what the -- what that**
 20 **information was?**
 21 A How do I know?
 22 **Q Yes. How did you know how many units, what**
 23 **the square-footage was, and the other things that you**
 24 **just talked about?**
 25 A Well, the director of sales, you know, gave

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1 us, you know, all the property description at the
 2 beginning. It was in the reservation process and I
 3 was, you know, trespassing what she was instructing us
 4 to say and -- and explain.
 5 **Q So, Maritza Meza was -- whatever information**
 6 **you had came from Maritza Meza?**
 7 A Correct.
 8 **Q Okay. You never get receive the information**
 9 **on the project from anybody else; is that correct?**
 10 A Correct.
 11 **Q Okay. How about Jill Cremer, is that name**
 12 **familiar to you?**
 13 A Jill Cremer, yes.
 14 **Q Who's Jill Cremer?**
 15 A Jill Cremer, I think she was working for the
 16 Trump -- Trump organization.
 17 **Q And what was her role in this project?**
 18 A She never had like an active role. It was,
 19 again, Michelle Conte, people from New York which was
 20 the person that's more knowledgeable about, you know,
 21 rental program, she was -- she can you know, explain
 22 the information. We -- we were only talking about the
 23 square-footage or location of the unit floor plan, all
 24 the other information, they are the one in charge.
 25 **Q They being Michelle Conte?**

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1 A Michelle Conte and Jill Cremer.
 2 **Q Okay. Do you know Ramola Motwani?**
 3 A Ramola Motwani, yes, she was like the ex-
 4 owner or something related with the land -- piece of
 5 land.
 6 **Q Okay. Have you met Ramola?**
 7 A I saw her. She's not a friend, she'll say
 8 "hello", she was one time visiting the Galleria
 9 Collection and I -- I -- I saw her.
 10 **Q Did you have any interaction with her**
 11 **relating to the project?**
 12 A Like interaction like in --
 13 **Q Discussions, e-mails --**
 14 A No, nothing.
 15 **Q -- telephone calls.**
 16 A Never, never, never.
 17 **Q You saw her one time when she came in to the**
 18 **Galleria?**
 19 A Yes, and I think she was in the event. And -
 20 -
 21 **Q And the event is the one we talked about --**
 22 A Correct.
 23 **Q -- where Wyclef Jean was performing?**
 24 A Correct. And just I forget, so much time ago
 25 that I don't -- I would love to and help you more but,

33

1 you know, I cannot tell you because I don't remember
 2 really.
 3 **Q I understand.**
 4 A It was too much time ago that, you know -- as
 5 I mentioned to you over the phone, I was the less
 6 important person in the office --
 7 **Q I understand.**
 8 A -- at that point.
 9 **Q How about Dev Motwani? Do you know Dev**
 10 **Motwani?**
 11 A Son, Ramola Motwani's son.
 12 **Q Yes. Have you met Dev?**
 13 A I know that Natin and Dev were the son and
 14 they were in the events but not -- no relation at all.
 15 **Q Do you know whether any of the Motwanis, as**
 16 **far as you knew, were involved in working on the**
 17 **project?**
 18 A Again?
 19 **Q Do you know whether the Motwanis were**
 20 **actively involved in any of the marketing, sales, or**
 21 **work relating to the project?**
 22 A I don't remember, no. Natin probably were
 23 more involved than the other. I saw Natin in Galleria
 24 but no -- but like, you know, when you see somebody
 25 that is walking, that's it.

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1 **Q Okay. How many times did you see Natin at**
2 **the project?**
3 A Two or three times.
4 **Q Did you ever speak with Natin about the**
5 **project?**
6 A Speak about the project. You know, I wasn't
7 really -- I wasn't important in the -- he -- I wasn't
8 really important. I think Maritza was the one talking
9 with Natin regarding the project.
10 **Q Do you know Roger Stein?**
11 A Yes.
12 **Q Who's Roger Stein?**
13 A I think he was like working together with Roy
14 Stillman.
15 **Q Did you have any direct communication with**
16 **Roger Stein?**
17 A Me through e-mail, no.
18 **Q Through anything, in person, by telephone, by**
19 **e-mail.**
20 A In person, he come two or three times to
21 Galleria. Again, probably, "Hi, how are you?" And,
22 okay. Let's go Maritza Meza, we didn't -- they have
23 the meeting. So, that was, you know, my communication
24 with Roger Stein.
25 **Q And you didn't participate in the meetings**

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1 **with Maritza Meza; is that correct?**
2 A No, sometimes she call "hi", where is Maritza
3 Meza, we pass the phone, the -- those type of, you
4 know, communication.
5 **Q Okay. I want to go through some documents**
6 **with you that relate to the project and see if any of**
7 **this either refreshes your memory or otherwise. So,**
8 **the first I'm going to give to you is marked as Exhibit**
9 **681.**
10 (Thereupon, Exhibit 681 was entered into the
11 record.)
12 **Q (By Mr. Altschul) And I would ask you to just**
13 **take a minute and take a look at this document. Have**
14 **you seen this document before?**
15 A Yes. It's signed by me.
16 **Q Is that your signature at the -- just above**
17 **the -- your printed name?**
18 A Yes.
19 **Q Okay. Did you prepare this document?**
20 A I really -- we didn't prepare. It was --
21 Maritza Meza made that for me and Rosemarie and her,
22 like a letter. And we were sending this to the client.
23 **Q Okay. So, this was a letter written by**
24 **Maritza Meza --**
25 A Yes.

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1 **Q -- is that correct? Okay. In the second**
2 **sentence, it says, "This is a new project pre-**
3 **construction developed by Donald Trump and Roy**
4 **Stillman." Do you see that?**
5 A Mm-hmm.
6 **Q Okay.**
7 THE COURT REPORTER: Is that a yes?
8 A Yes.
9 **Q (By Mr. Altschul) You have to say "yes". Did**
10 **you have an understanding that Donald Trump and Roy**
11 **Stillman were the developers of this project?**
12 MR. RUSSOMANNO: Objection to form.
13 **Q (By Mr. Altschul) You can answer the**
14 **question.**
15 A You know -- again.
16 **Q Sure.**
17 A What did you say?
18 **Q In your letter, you say that the project is**
19 **being developed by Donald Trump and Roy Stillman. I'm**
20 **asking you, did you understand that those two gentlemen**
21 **were the developers of the project?**
22 MR. RUSSOMANNO: Same objection.
23 **Q (By Mr. Altschul) You can answer. He can**
24 **make objections for the record or -- you know, to try**
25 **and -- for whatever reason he makes his objections, but**

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1 **you still have to answer the questions unless your**
2 **attorney tells you not to answer the questions.**
3 A I knew that Roy Stillman was the developer
4 and -- and I know that Trump International Hotel &
5 Tower Fort Lauderdale was one of the four signature
6 towers.
7 **Q Okay. Well, my question -- that's not my**
8 **question, though. In your -- in this letter, you say,**
9 **"This is the new project pre-construction developed by**
10 **Donald Trump and Roy Stillman." Did you understand**
11 **Donald Trump and Roy Stillman to be the developers of**
12 **this project?**
13 MR. RUSSOMANNO: Same objection.
14 A I -- I -- I don't know what to say. I -- you
15 know, this is a project, you know. They made the --
16 this -- this letter. Donald Trump was, you know -- the
17 name of the project is Donald Trump. So, I -- I -- you
18 know, I'm just, you know, following what, you know, is
19 in the letter.
20 **Q (By Mr. Altschul) Do you think that this**
21 **statement is false --**
22 MR. RUSSOMANNO: Objection to form.
23 **Q (By Mr. Altschul) -- the statement in your**
24 **letter that says "developed by Donald Trump and Roy**
25 **Stillman"?**

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1 A I don't think it's false because, you know,
 2 the Trump name is on -- on the -- on the name of the
 3 project.
 4 Q Okay. I didn't ask you about the name of the
 5 project, though. In your letter, you're saying, "This
 6 is a new project pre-construction developed by Donald
 7 Trump and Roy Stillman." And I'm asking you, as you
 8 sit here today, do you believe that statement was true
 9 when you made it?
 10 MR. RUSSOMANNO: Objection to form.
 11 A I -- I believe that, you know, Roy Stillman
 12 was the developer and, you know, the internal
 13 situations, I don't know.
 14 Q (By Mr. Altschul) Okay. But you've now said
 15 several times that you believe Roy Stillman was the
 16 developer. Did you believe Donald Trump was also one
 17 of the developers?
 18 MR. RUSSOMANNO: Objection to form.
 19 A I -- I don't know what to say. You know, I
 20 was called to -- to work in Trump International Hotel &
 21 Tower Fort Lauderdale. Roy Stillman -- and, you know,
 22 they give me the letter. We were promoting floor and
 23 square footage and, you know --
 24 Q (By Mr. Altschul) Okay. So, my question is,
 25 at the time that you signed this letter, did you

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1 believe that this was false, that Donald Trump was not
 2 one of the developers of the project?
 3 MR. RUSSOMANNO: Objection.
 4 A I -- I don't know.
 5 Q (By Mr. Altschul) You don't know whether it
 6 was true or false?
 7 A No. I -- I -- I don't want to put nothing
 8 false and I -- I'm really -- I'm very honest person.
 9 So, you know -- you know, I was, you know, following
 10 and I saw the -- the -- the project and it was carrying
 11 their name and I don't -- I don't know the -- the --
 12 the internal situations.
 13 Q Okay. So, it's your testimony you don't know
 14 whether this is true or not?
 15 A I don't want to assume. I think, you know,
 16 it was -- it was saying Donald Trump and Roy Stillman.
 17 And I just, you know, send the -- the -- the paperwork
 18 and the reservation. And, you know, the name Trump
 19 International Hotel & Tower, I knew that there are only
 20 four in the -- in Chicago and New York and I thought
 21 that, you know, we were also, you know, Trump
 22 International Hotel & Tower Fort Lauderdale.
 23 Q Well --
 24 A I don't know if it is developer, not
 25 developer. I don't know the internal situation.

40

1 Q Okay. As you sit here today, do you know
 2 whether or not Trump was one of the developers of this
 3 project?
 4 MR. RUSSOMANNO: Objection to form.
 5 A I don't know if it is or not. You know, when
 6 you make corporations, sometimes there are many people
 7 involved. And, you know, I don't know the -- the
 8 internal situation.
 9 Q (By Mr. Altschul) Now, this was a letter that
 10 you sent out to prospective purchasers, correct?
 11 A Reservations.
 12 Q Okay. When you prepared this, this was a
 13 letter you sent to people who showed interest in the
 14 project, correct?
 15 MR. CHARLIP: She said -- or it's a prepared
 16 --
 17 MR. ALTSCHUL: Okay. Well, she signed it. I
 18 understood her testimony.
 19 Q (By Mr. Altschul) Okay. When you prepared
 20 this version with your signature on it, to whom would
 21 you typically disseminate or send this type of letter
 22 to?
 23 A People that show interest because this is
 24 temporary brochure, floor plans.
 25 Q So, if somebody stops by the Galleria

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1 Collection and showed interest in the project, would
 2 you follow up with a letter like --
 3 A Correct.
 4 Q -- this one marked as Exhibit 681?
 5 A Correct.
 6 Q Do you know what the temporary brochure
 7 that's referenced in the fourth paragraph consisted of?
 8 A I think photocopies. Photocopies.
 9 Q Of what?
 10 A I think the picture of the building. I don't
 11 remember exactly. It was picture of the building. We -
 12 - we never really have like a nice -- nice brochures at
 13 the beginning because it was reservation. In
 14 reservation process, you can -- you can -- it's 100%
 15 totally refundable. If you want to proceed at the
 16 point of the contract, it's the one that the client has
 17 the opportunity to see if he wants to move forward or
 18 if he wants to cancel or if he does not agree with
 19 anything. Reservation, you know, is 100% -- if you
 20 don't like something, you can cancel any time.
 21 Q So, as far as temporary brochure, you think
 22 it was the photograph of the project and floor plans?
 23 A I don't remember exactly because it was
 24 prepared and we -- we just send. But it was for -- a
 25 picture of the future, you know, development.

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1 **Q Was it electronic or was it paper copy or**
2 **both?**
3 A I think it was electronic and paper copies.
4 **Q Okay. So, would you -- for example, with**
5 **Exhibit 681, is that something you would typically mail**
6 **to potential purchasers?**
7 A I think yes.
8 **Q Okay.**
9 A Yes, we may.
10 **Q Would you have also sent something --**
11 A I don't -- I don't remember. To be honest, I
12 do not --
13 **Q Okay. That's fine. I understand that this**
14 **was a long time ago. Do you know whether this was**
15 **something that may have also been sent by e-mail to**
16 **potential purchasers?**
17 A E-mail?
18 **Q Yes.**
19 A Yes. We sent via e-mail, via mail. But, you
20 know, I don't remember exactly, but, you know,
21 definitely, it says "temporary brochure". So, it must
22 be at the beginning stage.
23 **Q Okay. In the last paragraph, you said, "I'd**
24 **love to answer any questions you may have. Please call**
25 **me", and then it has your phone number. If people**

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1 **called for information, where did you get your**
2 **information from to be able to answer those questions?**
3 A Maritza.
4 **Q They didn't --**
5 A Maritza. The director was, you know, saying,
6 "Okay. How many units and" -- you know, "How many
7 units?" The square footage, it was a studio, one
8 bedroom and two bedrooms, that type, location and that
9 stuff.
10 **Q Okay. Let me show you what was previously**
11 **marked in the deposition as Exhibit 139 and ask you to**
12 **take a look at that for a moment, please.**
13 (Thereupon, a short discussion was had off
14 record.)
15 (Deposition resumed.)
16 **Q (By Mr. Altschul) And there are several**
17 **pages. And I believe there are four pages that I'm**
18 **going to go through and we can just take them one at a**
19 **time. Okay.**
20 A Okay.
21 **Q Okay. Let's start with the first page. Is**
22 **your -- is that your business card that's photocopied**
23 **onto this page?**
24 A Correct. Yes.
25 **Q And was this business card a single piece of**

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1 **paper or did it fold open?**
2 A Fold.
3 **Q Okay. And was there -- how is the rest of**
4 **the card designed that we can't see? I mean, I can see**
5 **what's on this photocopy, but how is the rest of the**
6 **card?**
7 A It was a twofold and it was blue and it has
8 like a brown folder.
9 **Q Okay. And now, I notice on what we do see,**
10 **it has at the bottom, it looks like, the Trump website.**
11 **Do you see that?**
12 A Mm-hmm.
13 **Q And that was the web- -- yes?**
14 A Yes.
15 **Q Okay. And that was the website for this**
16 **project, correct?**
17 A Correct.
18 **Q Was this business card just for this project?**
19 A Correct.
20 **Q Okay. Did this business card say anything**
21 **about Galleria Collection?**
22 A No.
23 **Q It was a Trump business card?**
24 A Yes.
25 **Q Okay.**

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1 A What -- it -- it was provided by Galleria
2 Collection, but it was only for the project, right?
3 **Q Sure. I understand. What I'm asking you is,**
4 **in looking at the business card, would anybody know**
5 **that it was a Galleria Collection business card as**
6 **opposed to being connected to Trump?**
7 A I don't know because, you know, when you work
8 for the developer, always there are -- like a Cervera-
9 related, Fortune. And when you work for a developer,
10 you don't -- you don't put Cervera (phonetic), Fortune-
11 related. You put the name of the project.
12 **Q Okay. So, was there anything on the card**
13 **anywhere that said "Galleria Collection"?**
14 A In this card, no.
15 **Q Do you have anything that had the logo --**
16 A But -- but the --
17 **Q -- logo for --**
18 A But the address is --
19 **Q Let me finish first. Any logo for Galleria**
20 **Collection on this business card?**
21 A Here, no, but the address is Galleria
22 Collection of Fine Homes, 945 East Las Olas Boulevard.
23 **Q That's the address for Galleria, correct?**
24 A Yes, correct.
25 **Q And there was no separate address for the**

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1 **project in Fort Lauderdale, correct?**
 2 A Correct, correct.
 3 **Q There was no sales office at the project**
 4 **site, correct?**
 5 A Correct. It's Galleria Collection.
 6 **Q And the Galleria Collection was the primary**
 7 **sales center for the project, correct?**
 8 A This is 945 East Las -- Galleria Collection.
 9 **Q Okay. So, again, in this, you're referring -**
 10 **- well, no. Strike that. Is this handwritten or is**
 11 **this printed from computer?**
 12 A No. Me -- my letters.
 13 **Q This is your handwriting? Okay. And it's**
 14 **all your handwriting on this page?**
 15 THE COURT REPORTER: Is that a yes?
 16 **Q (By Mr. Altschul) You have to say "yes".**
 17 A Yes.
 18 **Q Okay. Now, again, you refer to the -- you're**
 19 **sending someone a temporary brochure and a copy of**
 20 **everything by FedEx. Is that referring to, what you**
 21 **described a few minutes ago, the picture and the**
 22 **information about the project?**
 23 A Correct.
 24 **Q Now, also, if you -- do you see where you**
 25 **have a star on the left side and it says, "It's going**

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1 the value doesn't want to move forward at the point of
 2 the contract, you need to follow what the contract
 3 says. If the contract --
 4 **Q Okay.**
 5 A He's not agree with anything in the contract,
 6 he can cancel and -- you know, basically, and -- you
 7 know, so, that is -- you know, you must know real
 8 estate, how it is and its reservation. A -- a lot of
 9 details can change on the project when it's in the
 10 reservation process.
 11 **Q Okay. I think my question was, that's your**
 12 **handwriting --**
 13 A Oh, yes.
 14 **Q -- that says, "It's going to be finished**
 15 **early 2007", correct?**
 16 A Correct.
 17 **Q Okay. Did you believe that to be true at the**
 18 **time, at the time of reservations?**
 19 A Yes.
 20 **Q Okay. Who gave you that information?**
 21 A Again, my director of sales.
 22 **Q Maritza Meza?**
 23 A Correct.
 24 **Q Okay. Let's look at the next page. If you**
 25 **would turn to the second page of this exhibit. Again,**

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1 **to be finished early 2007"?**
 2 A Yeah, but I didn't put that. I don't know
 3 why is that.
 4 **Q That's not your handwriting?**
 5 A Right. It's my writing, but this -- it --
 6 the -- the -- the star --
 7 **Q The star is not yours?**
 8 A No.
 9 **Q Okay.**
 10 A That's not mine and the -- the line -- and
 11 the underline is not mine.
 12 **Q Underneath it? Okay. The sentence that**
 13 **says, "It's going to be finished early 2007", is that**
 14 **yours?**
 15 A We were instructed to say that, delivery
 16 date.
 17 **Q The delivery date?**
 18 A Correct.
 19 **Q As early 2007?**
 20 A Yeah. But this is -- remember, this is
 21 reservations.
 22 **Q I understand.**
 23 A In reservations, you -- the floor plan can
 24 change, the developer can change, the design can
 25 change. You can change everything. If the -- the --

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1 **is this all your handwriting?**
 2 A Correct.
 3 **Q And I'm going to -- well, I'm just going to**
 4 **point to it on mine so you can see it. Where it says,**
 5 **"Send me the reservation agreement by fax signed", do**
 6 **you see that?**
 7 A Yeah.
 8 **Q Did you send reservation agreements to people**
 9 **to sign?**
 10 A Reservations agreements?
 11 **Q Yes.**
 12 A Yes.
 13 **Q And were you familiar with the reservation**
 14 **agreement?**
 15 A I don't remember at this point, but it was
 16 two pages. I remember it was short. It's a
 17 reservation agreement like a -- you know, any
 18 reservation agreement projects.
 19 **Q And where did you receive the blank**
 20 **reservation agreements from?**
 21 A Where?
 22 **Q Yes.**
 23 A In Galleria.
 24 **Q Okay. Was that from Maritza as well?**
 25 A Correct.

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1 **Q** If you would turn to the third page. Is this
 2 your handwriting on this page as well?
 3 A Correct.
 4 **Q** And then if you would turn to the last page.
 5 And is -- where it says "Dear Eric" at the top and --
 6 A Correct.
 7 **Q** Let me ask you first. Is this Jill Cremer's
 8 business card photocopied on here?
 9 A Correct.
 10 **Q** And where did you get Jill Cremer's business
 11 card?
 12 A Maritza Meza gave us this paper and we were,
 13 you know -- you -- and, you know, sending to the
 14 clients.
 15 **Q** So, she gave you the paper with the photocopy
 16 of Jill Cremer's card already on it?
 17 A Yeah, because people needs to call her to
 18 have the information that they -- they need.
 19 **Q** What was -- I see that it has Trump
 20 International Hotel & Tower Fort Lauderdale letterhead
 21 on the top.
 22 A Correct.
 23 **Q** Was -- did you have some sort of original
 24 type of letterhead or was it all photocopies?
 25 A No. It was the -- like a -- how do you say

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1 it?
 2 **Q** Like parchment? Was it like a heavy paper?
 3 A It was like a -- when you have a paper in
 4 your office like at your company --
 5 **Q** Okay.
 6 A -- Joseph, and you send to the clients or --
 7 leather, like a --
 8 **Q** It was letterhead?
 9 A Correct.
 10 **Q** Okay. Now, at the bottom of this page, you -
 11 - is that your handwriting with the quote, "This is" --
 12 A Correct.
 13 **Q** -- "a dream of many but a reality for just a
 14 few"? Yes?
 15 A It's not like -- what?
 16 **Q** Okay.
 17 A I don't know who --
 18 **Q** It -- okay. First --
 19 A -- who was the one that say --
 20 **Q** Okay. First, is that your handwriting?
 21 A Yes.
 22 **Q** Okay. Where did that quote come from?
 23 A I don't remember. It -- it was nice. I like
 24 it. So, I took it probably.
 25 **Q** Okay. Do you have any idea where you took it

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1 from?
 2 A I don't remember at this point. But, you
 3 know, I like it.
 4 **Q** Let me show you what was previously marked as
 5 Exhibit 197.
 6 A This -- this is finished?
 7 **Q** Yeah, this is finished for the moment. Let
 8 me give you a copy of Exhibit 197 which is a
 9 reservation agreement with somebody named Joseph
 10 Masaro). What I'd like you to do first is review
 11 this and see if this appears to be the form reservation
 12 agreement that was used for this project.
 13 A Yes. Yes, this was the reservation
 14 agreement.
 15 **Q** And so, you're familiar with this agreement,
 16 correct?
 17 A Mm-hmm.
 18 **Q** Did you fill --
 19 THE COURT REPORTER: Is that a yes?
 20 Sorry.
 21 **Q** (By Mr. Altschul) Yes?
 22 A Yes.
 23 **Q** Did you fill some of these agreements out
 24 yourself?
 25 A If I sign?

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1 **Q** No, no. No, not did you sign. Did you
 2 actually fill out the --
 3 A Oh, yes.
 4 **Q** -- any of the agreements? Is your --
 5 A This is -- this is not my handwriting, but,
 6 you know -- probably yes, I'm sure. The -- if I was
 7 working, probably I fill out some -- not my -- this is
 8 not my handwriting.
 9 **Q** Okay. Now, at the very first par- -- the
 10 very first line of this reservation agreement, do you
 11 see it says, "SB Hotel Associates, LLC"? Who did you
 12 understand SB Hotel Associates, LLC to be?
 13 A The corporation that is, you know, promoting
 14 the -- the project.
 15 **Q** Okay. Now, did you -- do you know whether
 16 Trump was part of SB Hotel Associates?
 17 MR. RUSSOMANNO: Objection to form.
 18 A No, I don't know.
 19 **Q** (By Mr. Altschul) Okay. Do you recall
 20 telling people, when they asked you who was SB Hotel
 21 Associates, that it was Donald Trump's company to build
 22 this project?
 23 A No. I don't remember to say something like
 24 that, no.
 25 **Q** You didn't say it or you don't remember?

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1 A I didn't say that the -- the -- the -- I
 2 didn't release the information on who was part of the
 3 association or the corporate or -- because, you know,
 4 sometimes developer, they make corporations and, you
 5 know, it was just sales, you know, people.
 6 **Q Let me ask you. Did any buyers ask you who**
 7 **is SB Hotel Associates?**
 8 A I don't remember at this point, but -- I
 9 don't remember at this point.
 10 **Q So, you don't remember having conversations**
 11 **with any purchasers as to who was SB Hotel Associates;**
 12 **is that your testimony?**
 13 A "S", I mean probably it's Stillman. But, you
 14 know --
 15 **Q Do you --**
 16 A -- the other staff, no, I don't know.
 17 **Q Do you know if "S" is Stillman or not?**
 18 A Roy Stillman.
 19 **Q Do you know if the "S" in SB Hotel Associates**
 20 **is Stillman?**
 21 A I -- I assume, but I don't know. Stillman --
 22 SB -- Stillman needs to be -- I think that "S" is for -
 23 - for Stillman.
 24 **Q Okay. You assume that now or you assumed it**
 25 **at the time in 2005?**

55

1 A I don't remember exactly.
 2 **Q Okay. So, now --**
 3 A And -- and, you know, we were, you know,
 4 doing the sales, but all the questions or explanation
 5 to buyers or clients or -- like a -- the director is
 6 the one that was handling. We were -- basically,
 7 people were calling to request information over the
 8 phone. We were, you know, taking the phone calls and
 9 sending the reservation or floor plans via e-mail. But
 10 if they want like a -- like a -- more information
 11 there, she was all -- the -- every day there. So, she
 12 was the one handling like, you know, the more important
 13 or if the buyer have some more questions.
 14 **Q Okay. Because I saw a lot of e-mails like**
 15 **the ones we've seen. Where -- the --**
 16 A The -- the -- that -- that's the same e-mail,
 17 right?
 18 **Q You have to let me finish, though.**
 19 A Yeah.
 20 **Q No, no. I saw a lot of correspondence from**
 21 **you saying, "If you have any questions, call me", not**
 22 **call Maritza Meza. So, that's why I'm asking you these**
 23 **questions. And so, I'm asking you, you know, what you**
 24 **understood and what people asked you. And many people**
 25 **have testified in this case that they asked you who was**

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1 **SB Hotel Associates because the papers I received said**
 2 **Donald Trump and they've testified that your response**
 3 **was that was Donald Trump's entity to build this**
 4 **project. And so, I'm asking you if you have any memory**
 5 **of that.**
 6 MR. RUSSOMANNO: Objection to form.
 7 A I don't have -- I don't remember really.
 8 **Q (By Mr. Altschul) Okay. Let me show you**
 9 **what's -- I'm marking as Exhibit 682 and ask you to**
 10 **take a look at this document, please.**
 11 (Thereupon, Exhibit 682 was entered into the
 12 record.)
 13 **Q (By Mr. Altschul) Okay. First question for**
 14 **you is, is this your handwriting on this document?**
 15 A Correct.
 16 **Q Okay. And is this your other business card**
 17 **on the top of this page?**
 18 A It's The Galleria Collection of Fine Homes
 19 business card because usually you have one and Trump
 20 and probably you even have the -- the project card and
 21 that's why this -- this business card is there
 22 probably.
 23 **Q Okay. You don't remember for sure or you do?**
 24 A I don't know why I put that -- that business
 25 card, but probably that is the case.

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1 **Q Okay. And so, again, you said this is your**
 2 **handwriting on this, correct?**
 3 THE COURT REPORTER: Is that a yes?
 4 A Again?
 5 THE COURT REPORTER: Yes?
 6 A It's yes.
 7 **Q (By Mr. Altschul) Let me show you what I'm**
 8 **marking as Exhibit 683 and ask you to take a look at**
 9 **this document, please.**
 10 (Thereupon, Exhibit 683 was entered into the
 11 record.)
 12 A This is not my handwriting.
 13 **Q (By Mr. Altschul) That's not your handwriting**
 14 **on this document?**
 15 A No.
 16 **Q None of it? The smiley face at the bottom is**
 17 **not yours either?**
 18 A No.
 19 **Q Okay. Do you know whose handwriting this is?**
 20 A No, I don't know.
 21 **Q Have you seen this document before?**
 22 A This was the bullet that the -- the director
 23 of sales prepared to send to the clients. You know,
 24 they're training for studies, to handling residences
 25 like a -- you know, the bullet for that, the project.

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1 **Q And this is what Maritza Meza put -- gave to**
 2 **you?**
 3 A Correct.
 4 **Q Without the handwriting on the bottom?**
 5 A Without.
 6 **Q Okay.**
 7 THE COURT REPORTER: You said "bullet" or
 8 "bulletin"?
 9 A Well, how do you call these?
 10 MR. ALTSCHUL: Yeah. Bullet, yeah.
 11 THE COURT REPORTER: Bullets. Okay.
 12 MR. ALTSCHUL: Okay.
 13 (Thereupon, Exhibit 684 was entered into the
 14 record.)
 15 **Q (By Mr. Altschul) Let me show you what's**
 16 **marked as 684 and ask you to take a look at that,**
 17 **please. Is this your handwriting in Exhibit 684?**
 18 A Correct. But all -- all of them -- this
 19 handwriting, I think all of them are related with the
 20 reservation process; I am correct?
 21 **Q At all what?**
 22 A The reservation -- reservation process?
 23 **Q Well, let me ask you. See in the upper right**
 24 **corner where it says, "Please return two originals"?**
 25 A Uh-huh.

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1 **Q What were you looking for two originals of?**
 2 **Did you request two originals on the reservation?**
 3 A I don't remember.
 4 **Q Okay. I mean, didn't people just fax you the**
 5 **reservation agreements and then -- and send the check**
 6 **and that was sufficient?**
 7 A I don't remember how it was. It was through
 8 fax or via mail. Probably mail and FedEx, a check, the
 9 original or something like that.
 10 **Q Okay. Well, let me ask -- let's look at the**
 11 **second paragraph where you say, "Please, as soon as you**
 12 **receive the package, give me a call. I can go over any**
 13 **questions." Do you know what the package is?**
 14 A Remember that I mentioned to you the
 15 photocopies of the -- the -- the rendering of the
 16 project outside? We didn't have any renderings, lobby
 17 renderings, nothing.
 18 **Q Okay.**
 19 A And, you know, people were very anxious to
 20 buy at that point. So --
 21 **Q Now, what --**
 22 A -- people were fighting for the units.
 23 **Q Okay. Now, did all the units sell out in**
 24 **reservation?**
 25 A Reservation, yes -- yes.

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1 **Q Okay.**
 2 A It was all reserved at -- you know, after,
 3 people were, you know, cancelling and --
 4 **Q Did you sign a reservation agreement?**
 5 A For myself?
 6 **Q Yes.**
 7 A I don't remember. I was interested because I
 8 -- you know, I like the project. I was interested, but
 9 I don't remember at this point. I -- I remember that I
 10 wanted one time, one of the unit, but I think I -- that
 11 I didn't move forward finally.
 12 **Q Okay. You think you didn't move forward?**
 13 A No.
 14 **Q You mean you didn't sign the purchase**
 15 **contract?**
 16 A No. I didn't sign finally the reservation
 17 agreement.
 18 **Q You didn't even sign the reservation**
 19 **agreement?**
 20 A No, no, no.
 21 **Q Okay.**
 22 A But, you know, I was interested in one unit
 23 that I love it and I love it and the developer, I
 24 think, they give me -- didn't give me the price that
 25 they wanted. I want to purchase one because it was

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1 very hot at that point. And, you know, in some of the
 2 names that I -- you are showing me here, you know,
 3 people were anxious to buy. I didn't even have to
 4 convince them. They were buying over the phone.
 5 (Thereupon, Exhibit 685 was entered into the
 6 record.)
 7 **Q (By Mr. Altschul) Let me show you what's**
 8 **marked as Exhibit 685 and ask you to take a look at**
 9 **that document, please. Okay. Is this your handwriting**
 10 **on 685?**
 11 A Yes.
 12 **Q And again, we see the statement, "It's going**
 13 **to be finished early 2007." You believe that to be**
 14 **true at the time you wrote this, yes? Correct?**
 15 A Yeah. We were like, I think, 2004, 2005.
 16 2005, I think so. Yes.
 17 **Q The earliest I've seen --**
 18 A Yes.
 19 **Q -- is -- the earliest reservation agreements**
 20 **I've seen were February 2005.**
 21 A Okay.
 22 (Thereupon, Exhibit 686 was entered into the
 23 record.)
 24 **Q (By Mr. Altschul) Let me show you what's**
 25 **marked as Exhibit 686 and ask you to take a look at**

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1 **that document, please. This is your handwriting,**
 2 **again, 686? Yes?**
 3 A Yes, this is my handwriting. I was -- you
 4 know, I was doing all this paper, I was very
 5 workaholic. Remember that we were a team all together
 6 so it was --
 7 **Q Now, I understand you're a team, I'm trying**
 8 **to just ask you questions on the stuff that you were**
 9 **involved in.**
 10 A Yeah. But some of the name I don't even know
 11 the client or the -- the -- so, even if I write the --
 12 the notes, I don't even know the name of -- because
 13 remember that, you know, we were doing it all together.
 14 That's why, you know.
 15 (Thereupon, Exhibit 687 was entered into the
 16 record.)
 17 **Q (By Mr. Altschul) Okay. Let me show you**
 18 **what's been marked as Exhibit 687. Have you seen this**
 19 **before?**
 20 A This?
 21 **Q Yes.**
 22 A Yes.
 23 **Q Is this your handwriting as well?**
 24 A Correct.
 25 **Q Now, this -- the original of this, did you**

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1 **have -- I know we saw a different paper before that was**
 2 **like a letterhead, was this a different type of**
 3 **document. It looks like it's smaller than a letter --**
 4 **letterhead.**
 5 A I think this was a note. A note. Probably
 6 this -- it was a piece of like, you know, those block
 7 like a -- and stick -- stick --
 8 **Q Like Post-Its?**
 9 A Post-Its. Correct, Post-Its.
 10 **Q Okay. Were there Post-Its with the --**
 11 **A With the --**
 12 **Q -- with the Trump logo on it?**
 13 A No. What -- these Post-Its. But, you know,
 14 this probably was with the -- those photocopies,
 15 remember, that I mentioned --
 16 **Q Sure.**
 17 A -- that with the -- the rendering of the
 18 front of the building.
 19 **Q Okay.**
 20 (Thereupon, Exhibit 688 was entered into the
 21 record.)
 22 **Q (By Mr. Altschul) I'm going to show you**
 23 **what's marked as 688 and ask you to take a look at**
 24 **that, please.**
 25 A This is not the same that we saw before, the

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1 Jill Cremer business card with the -- with the phrase
 2 "dream of many and reality".
 3 **Q Let me see. You could be right. I thought -**
 4 **-**
 5 A I think it's the same.
 6 **Q -- it was different, but let me look.**
 7 A The one that has Jill Cremer business card.
 8 MR. RUSSOMANNO: Exhibit 139, the last page
 9 to --
 10 **Q (By Mr. Altschul) This is the one you're**
 11 **referring to, correct? The last page of --**
 12 A It's this one, right?
 13 **Q -- Exhibit 139, that appears to be the same,**
 14 **yes?**
 15 A Correct. Yeah, the same.
 16 **Q Okay. So, then, your answers are all the**
 17 **same, right?**
 18 A Yeah.
 19 **Q If I ask you all the same questions, you**
 20 **would give me the same answers, right?**
 21 A Correct. I'm just -- believe me, it's not
 22 that I want to interfere with you, I know that you --
 23 you know, I don't -- I don't want to be in the middle
 24 of this --
 25 **Q That's okay.**

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1 A -- you know.
 2 **Q That's okay. You're here now and we're, you**
 3 **know, recording whatever it is that you remember. So,**
 4 **let me show you what was previously marked as Exhibit**
 5 **262 in this case and ask you take a look at that.**
 6 A Okay.
 7 **Q Have you seen this document before?**
 8 A But it's not that -- it's an e-mail that, you
 9 know, were approved --
 10 **Q Just -- when I say document, I'm referring to**
 11 **this e-mail.**
 12 A Oh, okay.
 13 **Q This one page, 262.**
 14 A Yes.
 15 **Q Is that your e-mail?**
 16 A Yes. And, you know, we were sending exactly
 17 the same e-mail to everybody that was interested. I
 18 think you know that the attachment probably is the
 19 picture of the building if I'm not correct.
 20 **Q Okay. I'm going to go through several**
 21 **different documents and see if any of them appear to**
 22 **you to be what was that document that you just referred**
 23 **to. But this you believe you would have sent to**
 24 **everybody who was interested on the project, correct?**
 25 A Yes. Also, you'll see the forward sign

66

1 there.

2 **Q Where are you referring to?**

3 A These.

4 **Q I'm sorry? Point again.**

5 A These.

6 **Q Those little arrows? What do those little**

7 **arrows mean?**

8 A Already forward.

9 **Q Forward. Okay. So, you forwarded this from**

10 **a prior e-mail, is that what you mean? You would send**

11 **this e-mail to somebody else and then you --**

12 A Well, you know, they text it -- it was the

13 same because, you know, people were, you know, calling

14 for the -- for the -- in the lines, regular lines. They

15 were calling to request information.

16 (Thereupon, Exhibit 689 was entered into the

17 record.)

18 **Q (By Mr. Altschul) Let me show you what's been**

19 **marked as Exhibit 689 and ask you to take a look at it.**

20 **I'm actually going to show you a colored copy even**

21 **though I'm not going to mark the colored copy. Here is**

22 **the colored copy.**

23 A So, this is a --

24 **Q And my question for you is: Do you believe**

25 **this is the temporary brochure that you referred to?**

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1 A Correct. No. The -- the remarkable

2 location, this I don't know if it was a temp- -- I

3 don't remember these two pages.

4 **Q Which pages don't you remember?**

5 A This about the "Can the purchase of a hotel

6 condominium be financed" and all that stuff. I don't -

7 - I don't think that that is the top of it, the

8 temporary brochure.

9 **Q Okay. Let me make sure I understand. You**

10 **pulled out the page that across the top -- the first**

11 **one says "remarkable location" at the top; is that**

12 **correct?**

13 A Yes.

14 **Q And then the second -- and then the next page**

15 **you pulled out is the following page which starts with**

16 **"Can the purchase of a hotel condominium be financed"**

17 **with the question mark. Yes?**

18 A Yes.

19 **Q Okay. Those two pages you think were not**

20 **part of the temporary brochure, correct?**

21 A I don't remember but I don't -- I don't think

22 so to see these two pages.

23 **Q Okay. So, removing those two pages, you**

24 **believe the rest of this document was --**

25 A The temporary.

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1 **Q -- the temporary brochure?**

2 A Yes.

3 **Q And that's what you sent to people who were**

4 **interested in the project?**

5 A I don't remember it was exactly this but,

6 yeah. Probably, yes. I don't remember. I think it

7 was worse or was uglier than this one.

8 **Q It was what, uglier?**

9 A Ugliest -- uglier than this one.

10 **Q In what way was it uglier than this one?**

11 A I don't know. But it wasn't at all prepared

12 like this. They was, you know, uglier than this one.

13 This is too much. Right. I think it was like a -- a

14 fewer pages. Yes. Probably, yes. If you have it

15 probably because here -- I don't keep anything, you

16 know, from that time.

17 **Q Sure. Okay. And with those two pages**

18 **attached is the way I have seen them. I haven't seen**

19 **them with the removal of the two pages but --**

20 A It was --

21 **Q But that doesn't mean the fact that I have**

22 **seen it that way doesn't mean --**

23 A Yes.

24 **Q -- that those pages were part of the**

25 **original.**

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1 A Yeah. Part of this. I'm sure this is the

2 picture because this is the what -- the picture that we

3 were using. The rest I'm not really sure.

4 **Q And this is the cover page that you're**

5 **referring to --**

6 A Correct.

7 **Q -- correct?**

8 A Correct.

9 **Q If you can pass the colored copy back,**

10 **please. That whole set, if you could pass that back to**

11 **me. And this is the black-and-white copy which we'll**

12 **leave with the exhibits.**

13 **Let me show you a document that I'm marking**

14 **as Exhibit 690 and ask you to take a look at this**

15 **document, please.**

16 (Thereupon, Exhibit 690 was entered into the

17 record.)

18 A Yeah. As you see, so beautiful the letter

19 that I didn't prepare this.

20 **Q (By Mr. Altschul) You didn't prepare this?**

21 A No. No.

22 **Q Okay. Who --**

23 A That it was prepared for some -- probably

24 Maritza.

25 **Q Okay. Let me ask you this: Is this your**

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1 signature on this letter?
 2 A That's correct.
 3 Q And your name underneath the signature,
 4 correct? Yes?
 5 A Yes.
 6 Q Okay. But you're saying you didn't sign this
 7 letter.
 8 A No. No.
 9 Q I mean you didn't prepare it.
 10 A It's signed by me but I didn't prepare this -
 11 - this letter.
 12 Q Okay.
 13 A The English word in this is definitely
 14 perfect.
 15 Q Okay. Did you -- did somebody translate this
 16 for you or did somebody else write it completely?
 17 A No. That somebody gave me the letter.
 18 Exactly who it is, I was just putting, you know, my --
 19 my name.
 20 Q Okay. If you would look to the sentence
 21 that's just before the last sentence, it says "This is
 22 a dream of many but a reality for just a few." That's
 23 the same quote --
 24 A Yes.
 25 Q -- that you would use previously, correct?

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1 A I don't remember what I do there. I don't
 2 know if it was a broker or Maritza or -- or I copied
 3 from some places or -- I -- I don't at this point where
 4 I took that phrase.
 5 Q And on the bottom we see a -- what looks like
 6 a business card. Is that the front of the business
 7 card that you described?
 8 A Correct. Correct. Yes.
 9 Q So when you handed out a card for this
 10 project, on the cover, it had what we see on this
 11 Exhibit 690?
 12 A The -- correct. That's the cover.
 13 Q And then inside, it had what we saw on the
 14 other page which is --
 15 A Correct.
 16 Q -- was your name? Okay.
 17 Let me show you what we're marking as Exhibit
 18 691 and ask if you've seen this document before.
 19 (Thereupon, Exhibit 691 was entered into the
 20 record.)
 21 A Yes, I remember this. I think it was a --
 22 like a promotional material or -- it wasn't
 23 promotional, I think it's a magazine, right?
 24 Q (By Mr. Altschul) This comes from a magazine.
 25 A Yeah.

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1 Q And I've seen just this together in people's
 2 files. And so I'm asking if -- do you remember this
 3 being a document that was handed out to potential
 4 purchasers, this article?
 5 A I don't know if it was but it was a -- I
 6 think it was a magazine that, you know, they put
 7 together and send, you know, as an update for the --
 8 for the clients, because the reservation process stayed
 9 very long so --
 10 Q Do you know when this magazine was from and
 11 any recollection of that at all?
 12 A No. No, I don't remember.
 13 Q So, you don't know -- you do not recall this
 14 being an article that was given to potential buyers in
 15 the project?
 16 A I think we sent probably via mail or -- or
 17 was through the office. But I don't I remember exactly
 18 but I remember to see this -- this picture and -- and
 19 the project but, you know, I don't remember exactly
 20 where we -- when we sent this or we give to the buyer.
 21 I think probably was there like a promotional or --
 22 Q You think those probably in the sale center?
 23 A Probably, yes. Probably, yes.
 24 Q Okay. You're not sure either way?
 25 A I am not sure. Because, you know, sometimes

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1 developer, they make copy of where they are so --
 2 Q Let me show you what I'm marking as Exhibit
 3 692 and ask you to take a look at this document,
 4 please.
 5 (Thereupon, Exhibit 692 was entered into the
 6 record.)
 7 A Yes.
 8 Q (By Mr. Altschul) Okay. Have you seen this
 9 document before?
 10 A Yes. I don't remember but definitely, yes, I
 11 am sure that it must be from the office, Galleria
 12 Collection. It says Galleria Collection.
 13 Q Okay. You're referring to the fax line
 14 across the top, that's where you put --
 15 A The fax sheet. Fax sheet.
 16 Q No, no. The facsimile line is what you were
 17 pointing to when you said Galleria Collection?
 18 A No, because it says Galleria Collection
 19 there.
 20 Q Right. You understand that that's from a fax
 21 machine, right?
 22 A Correct.
 23 Q Okay. Do you recall seeing this document
 24 before?
 25 A Yes.

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1 **Q Okay. Look on the fourth section of**
 2 **information on the first page where it says**
 3 **principal/owners. Do you see that?**
 4 A Yes.
 5 **Q Do you see it says Donald Trump, Roy Stillman**
 6 **and Bayrock Group?**
 7 A Yes.
 8 **Q Did you understand those three to be the**
 9 **owners of the project?**
 10 MR. RUSSOMANNO: Objection to the form.
 11 A Where it says -- it says they're principal
 12 owner but the developer Roy Stillman.
 13 **Q Yeah. We will get to that in just a minute.**
 14 **Right now I'm asking you about the owners. Did you**
 15 **believe that was true? And I asked you about the**
 16 **owners.**
 17 MR. RUSSOMANNO: Same objection.
 18 **Q (By Mr. Altschul) Did you believe that Donald**
 19 **Trump, Roy Stillman and Bayrock Group were the**
 20 **principal owners of the project?**
 21 A That's what it say so --
 22 **Q Okay. Did you believe it to be true?**
 23 MR. RUSSOMANNO: Objection to the form.
 24 A Trump was the -- the Trump International
 25 Hotel & Tower carried the name so I --

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1 **Q (By Mr. Altschul) That's not my question. My**
 2 **question is: Did you believe the three gentlemen --**
 3 **the three entities' named, Donald Trump, Roy Stillman**
 4 **and Bayrock Group, were the principal/owners of this**
 5 **project?**
 6 A Yes.
 7 **Q Okay. The next section, developers, now it**
 8 **says Roy Stillman and Bayrock Group, LLC. Do you see**
 9 **that? Okay. And -- the -- what? Yes? Yes?**
 10 A Yes. Yes.
 11 **Q Okay. The document that we saw before that**
 12 **was marked as Exhibit 681, which you signed, said**
 13 **Donald Trump and Roy Stillman were developing the**
 14 **project. Do you see that this is a little bit**
 15 **different than that? If you look at -- you know what,**
 16 **look at 681 --**
 17 A Yes.
 18 **Q -- and let's just look at them side by side.**
 19 **And on 681, I'm referring to the second sentence, which**
 20 **is a new project --**
 21 A Developed by Donald Trump and Roy Stillman.
 22 **Q And then on the second one that I gave you,**
 23 **6 --**
 24 A It says Roy Stillman and Bayrock Group.
 25 **Q Yes. Do you see the difference?**

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1 A Yes. But I didn't realize when -- when we
 2 were instructed to send this letters.
 3 **Q Okay. Do you know who didn't realize --**
 4 **first of all, do you know if either one is correct?**
 5 A I wasn't -- I didn't prepare this so --
 6 **Q Okay. You didn't -- you have no --**
 7 A Never.
 8 **Q -- no input into the preparation of this,**
 9 **correct?**
 10 A No. At all.
 11 **Q So -- okay. Strike that. I want to show you**
 12 **some of the sales brochures and materials which I'm not**
 13 **going to mark as exhibits in this case just. because of**
 14 **the size and I don't have quality photocopies of them,**
 15 **but I want to know if you have seen these documents**
 16 **before. The first one I'm going to describe as -- has**
 17 **16 pages consisting of articles about the project that**
 18 **seemed to be -- to have been put together as some form**
 19 **of sales material. If you would take a moment and look**
 20 **through that.**
 21 **Have you seen this document before?**
 22 A Yes.
 23 **Q (By Mr. Altschul) Okay. Tell me what you**
 24 **understand that to be. I know I tried to describe it**
 25 **but let me ask it as through a different word. How was**

77

1 **that document used?**
 2 A I think it was in Galleria Collection on the
 3 -- on the -- like a table so the people will come --
 4 any client come and pick up some, you know, of this
 5 material.
 6 **Q Okay. Was this something that you gave to**
 7 **potential purchasers?**
 8 A Probably, yes, because it was there in
 9 Galleria Collection. Yes, they prepared this.
 10 **Q The Galleria Collection prepared this?**
 11 A Correct.
 12 **Q Okay. This wasn't prepared in New York as**
 13 **far as you know?**
 14 A I don't know where it was prepared, but, you
 15 know, I know that it was there.
 16 **Q Okay. You know it was in the Galleria**
 17 **Collection?**
 18 A Yes. But I don't know if that was prepared
 19 by in New York or Galleria. I don't know who --
 20 **Q You don't know?**
 21 A -- which one.
 22 **Q Okay. Let me also show you a document that**
 23 **I'll describe as a brochure with a spiral binding on**
 24 **the left-hand side and ask if you had seen document**
 25 **before.**

78

1 A Yes.

2 **Q Okay. Would you please explain what this**

3 **document is.**

4 A This is like a brochure. A brochure.

5 **Q Was this brochure prepared by the Galleria or**

6 **in New York if you know?**

7 A I don't know. I don't know where it was

8 prepared but --

9 **Q Was this a brochure that was given out to**

10 **potential purchasers?**

11 A Correct.

12 **Q Was this another brochure that was available**

13 **in the sales office for people to --**

14 A Yes.

15 **Q -- to have?**

16 **Let me show you another document that I'll**

17 **describe as a brochure with a bifold -- two sides and**

18 **ask you to look at the materials in here. And this one**

19 **in particular has Rosemarie Friedman's business card**

20 **attached.**

21 A And this is the brochure, correct.

22 **Q Okay. But you're --**

23 A This is -- I think it's the -- no. That one

24 is the final brochure.

25 **Q Which one is the final brochure?**

80

1 **Q If you can pass that back, please. And let**

2 **me show you a foldout that is blue in color so it's one**

3 **of a kind and is dated fall 2005 on the bottom left-**

4 **hand corner, ask you to take a look at that document.**

5 A Yes. They -- this was prepared by -- I don't

6 know who but, you know, somebody in the -- in the

7 office and we -- we were having this also, you know, in

8 the Galleria.

9 **Q You had these in the office?**

10 A Yes.

11 **Q And do you know if these were also mailed to**

12 **people who would sign reservation agreements?**

13 A Yes. Yes, I think so.

14 **Q Okay. And let me just show you the back**

15 **where it has the postage information. Do you see that?**

16 A Paul Genasci (phonetic), yes.

17 **Q Okay. So, this was mailed to people who**

18 **would sign reservation agreements, correct?**

19 A Correct. Because, you know, reservation stay

20 forever and ever and ever and ever.

21 **Q So, did -- in the Galleria, did they believe**

22 **it wasn't -- strike that. The reservations that I've**

23 **seen were signed primarily between February and June of**

24 **2005. The purchase contracts were signed in December**

25 **2005 and January 2006. So, you have a fair --**

79

1 A The big one.

2 **Q The brown book?**

3 A Yeah.

4 **Q Okay. We're going to come to that in a few**

5 **minutes.**

6 A But this one I don't know what come in the

7 middle so we were having all there in the Galleria so

8 people were coming and picking up the -- the brochure

9 that they are interested. It was many projects in

10 Galleria, not only this one, so --

11 **Q And were these brochures also sent to people**

12 **who had already signed reservation agreements?**

13 A Yes. Probably, yes. Definitely.

14 **Q And do you see the letter in the left-hand**

15 **side?**

16 A Yes.

17 **Q You've seen that letter before, correct?**

18 A Yes.

19 **Q And as you see this brochure put together**

20 **with the letter in the left-hand side, is that how it**

21 **was given out to people or --**

22 A Correct.

23 **Q -- or mailed to people who would sign**

24 **reservation agreements?**

25 A Correct.

81

1 A One year.

2 **Q -- a fairly significant gap in there. It**

3 **could be one year. If you take the earliest one in**

4 **February of '05 and the later contract in February '06,**

5 **you have almost a year. During that time, did the**

6 **sales staff believe it was important to continue to**

7 **send information to purchasers to keep them interested**

8 **in the project?**

9 A Yes. But, you know, since the market were

10 too hot, you know, basically, we didn't have to

11 reinforce a lot because people were buying over the

12 phone like a -- you know, I've never seen something

13 like that in the past.

14 **Q Okay. Do you know why --**

15 A Not with --

16 **Q Do you know why they bothered to spend all**

17 **the money to prepare these and send them out if they**

18 **didn't need them?**

19 A Yes. Definitely. Definite -- no, no, no,

20 no. But, you know, developers need to prepare those

21 brochures because it's like, you know, material for

22 them --

23 **Q It's what?**

24 A -- to promote their project.

25 **Q I'm sorry?**

82

1 A Material.

2 **Q Okay.**

3 A Like a promotional or -- marketing material,

4 right?

5 **Q Okay. Was there ever any discussion about it**

6 **being important to continue to communicate with people**

7 **who would sign reservation agreements by sending them**

8 **whether it's articles or brochures?**

9 A It is I wasn't really involved in any

10 discussion or -- or strategies or technics because we

11 were receiving, you know, where -- and it's like if we

12 have to send it, we'll have to send it. And even, you

13 know, that we didn't -- we didn't -- we wasn't really

14 in charge of sending the mailing, it was the office,

15 the administrative part of the office to do that, and

16 --

17 **Q Who would that have been?**

18 A Mel Winnick and the people that were working

19 in the administration in Galleria.

20 **Q Melissa Winnick, Sherry Boylan?**

21 A Correct. Galleria.

22 **Q Okay. And now, let me show you what I call**

23 **the brown hardback book and ask you if you have seen**

24 **this before.**

25 A Yes.

83

1 **Q And what is this?**

2 A The brochure.

3 **Q This is what you refer to as the final**

4 **brochure?**

5 A This is -- this is nice, at least --

6 **Q It's very nice. It's very --**

7 A -- compared with the -- with the photocopies.

8 **Q Do you know who prepared this?**

9 A No, I don't know.

10 **Q Okay. Is this something that was also sent**

11 **to all the people that signed reservation agreements?**

12 A I think not reservation, it was a contract --

13 **Q You think that --**

14 A -- what they sent.

15 **Q You think that would --**

16 A If they sent the contract, they get their

17 book; if not, no.

18 **Q Okay.**

19 A Too expensive. No, I'm just kidding.

20 **Q Okay. Were you serious or were you kidding?**

21 A No. I'm just kidding. Kidding.

22 **Q Okay.**

23 A No. I think it was with the contract. And

24 this didn't arrive in the reservation process.

25 **Q Okay. So, you think this came after the**

84

1 **reservation period?**

2 A Yes.

3 **Q Okay. And do you think that was sent by**

4 **itself or do you think it was sent together with**

5 **something else?**

6 A This one?

7 **Q Yes.**

8 A I don't remember. I don't remember the

9 timing. Exactly the timing, no, I don't remember.

10 **Q Okay. Let me ask you --**

11 A I think it was for the buyers.

12 **Q Are you familiar with the brown box -- what**

13 **we've come to call the brown box in this case?**

14 A Correct.

15 **Q What do you understand the brown box to be?**

16 A The contract.

17 **Q The contract and what else?**

18 A That's the contract.

19 **Q And the legal documents, right?**

20 A Yes. Correct.

21 **Q The condominium documents, the property**

22 **report?**

23 A Correct.

24 **Q And -- now, those were sent to all**

25 **purchasers, correct?**

85

1 A Everybody. That one is the -- really the

2 decision and who wants to move forward or who wants to

3 cancel.

4 **Q Do you think that this brown book was sent**

5 **together with this?**

6 A I don't remember.

7 **Q Okay.**

8 A I don't remember the time where the brown

9 book arrived than the other one. I -- I'm not sure --

10 **Q Okay.**

11 A -- if that was before or -- or it was

12 together.

13 **Q Did you go through all the material that's in**

14 **the brown book -- brown box yourself?**

15 A No. I'm not an expert. And, you know, my

16 English also is not, like, so perfect to understand

17 those complicated -- but, you know, I know that it's a

18 condo docs and it's the -- the hot property report

19 which is scary so --

20 **Q Okay. Did you ever review the condo docs in**

21 **this case?**

22 A The condo docs.

23 **Q Yeah. Did you read them?**

24 A Not -- not the whole book, no.

25 **Q Okay. Did you read the HUD property report**

86

1 **in this case?**
 2 A I know that I saw it. And, you know, that --
 3 that is really the people that wants to move forward,
 4 that is the -- the point. If they want to move
 5 forward, they move; if not, they can cancel, right?
 6 **Q Right. Until this sign their contract,**
 7 **right, and the 15 days after?**
 8 A Correct.
 9 **Q Okay.**
 10 A 15 days reviewing period.
 11 **Q And that's the case even if they -- even if**
 12 **there was no HUD property report for a condominium,**
 13 **they still have 15 days after to cancel, correct?**
 14 A Yes. Yes. Yes.
 15 **Q For all condominiums that are developed in**
 16 **Florida?**
 17 A 15 days reviewing period, correct.
 18 **Q Correct.**
 19 MR. ALTSCHUL: Let's take about a five-minute
 20 break. I might be pretty much wrapped up, but I
 21 just want to step out and go through my notes.
 22 (Thereupon, a short break was taken.)
 23 (Deposition resumed.)
 24 THE COURT REPORTER: Okay. Back on.
 25 **Q (By Mr. Altschul) Have you had any -- strike**

87

1 **that. Now that we have gone through some documents, if**
 2 **you have any recollection of when you left working on**
 3 **this project?**
 4 A I don't remember. It was almost ten years or
 5 more, right?
 6 **Q Well, most of the contracts were signed in**
 7 **January -- December of 2005 or January of 2006. Did**
 8 **you continue to work on this project after that time?**
 9 A I was -- I pass to Da Vinci on the Ocean. A
 10 second project on Sunny Isles Beach --
 11 **Q Okay. And when did you --**
 12 A -- with Galleria Collection of Fine Homes.
 13 **Q Okay. Do you know approximately when it was**
 14 **that you transitioned to Da Vinci on the Ocean?**
 15 A No. It was, you know -- I don't remember
 16 exact but, you know, I remember that we did the
 17 contract and we passed to the second project.
 18 **Q Okay. Have you had any follow-up on the**
 19 **Trump project since --**
 20 A With the client?
 21 **Q -- since you transitioned to Da Vinci on the**
 22 **Ocean?**
 23 A With the clients or --
 24 **Q With anybody. With anybody.**
 25 A Michelle Conte were, you know, talking -- you

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1 know, asking me because, you know, she -- she moved to
 2 Fort Lauderdale. I think she was kind of -- Maritza
 3 Meza was gone and everybody were gone so Michelle Conte
 4 called me two times or three times, but, you know, I
 5 don't recall -- beside that, everything was like every
 6 -- different places. Nobody was there.
 7 **Q Do you know how long it's been since you had**
 8 **communication with Michelle Conte?**
 9 A I don't have any -- but -- I don't know
 10 anything about her right now.
 11 **Q Okay. Since that time when you had contact**
 12 **with Michelle Conte, have you had any further**
 13 **communication or contact with Stillman or his company?**
 14 A Zero.
 15 **Q Zero?**
 16 A Zero.
 17 **Q And how about with Trump or his company?**
 18 A Zero.
 19 **Q And how about with Bayrock or their company?**
 20 A Never had communication with Bayrock, no. No.
 21 **Q How about with any purchasers?**
 22 A Zero.
 23 **Q So, you haven't had -- once you transitioned**
 24 **to Da Vinci --**
 25 A Da Vinci.

89

1 **Q -- you were done with this?**
 2 A Yes.
 3 **Q No further communication with anybody?**
 4 A Zero. Zero.
 5 **Q Until now?**
 6 A Until now that you are calling me and I
 7 didn't want to be in the middle because it wasn't
 8 really good experience for me.
 9 **Q Okay. Yeah. Why didn't you want to appear**
 10 **for deposition?**
 11 A Because you never want to be in the middle.
 12 Never been in the -- I'm -- you know, I am person who
 13 didn't have any problem with anybody. I don't like
 14 conflict.
 15 **Q Okay.**
 16 A So, I don't want to be in the middle.
 17 MR. ALTSCHUL: Okay. All right. I have no
 18 further questions.
 19 MR. RUSSOMANNO: I just have a couple.
 20 (Thereupon, a short discussion was had off
 21 record.)
 22 (Deposition resumed.)
 23 CROSS-EXAMINATION
 24 BY MR. RUSSOMANNO:
 25 **Q Good afternoon.**

90

1 A Good afternoon.

2 **Q I'm one of Donald Trump's lawyers. I'm just**

3 **going to ask you just a handful of question. As we**

4 **went through earlier, I'm not the one that subpoenaed**

5 **you to testify for deposition today Mr. Altschul's**

6 **office did. He represents the plaintiffs. But I have**

7 **an opportunity to ask you a couple of questions. And**

8 **let me just go through a couple of them. It's true**

9 **that you've never been employed by Donald Trump or**

10 **Trump Organization, correct?**

11 A Correct.

12 **Q And Donald Trump never gave you the**

13 **instructions that Maritza Meza gave to you, correct?**

14 A Correct.

15 **Q And Donald Trump or his organization, the**

16 **Trump Organization, never gave you these instructions**

17 **that you said Maritza Meza gave you, correct?**

18 A Correct.

19 **Q And you said earlier, you don't know who**

20 **prepared the sales materials and brochures, right?**

21 A I don't know.

22 **Q And when you mentioned the rental program**

23 **with Jill Cremer earlier, that was in regard to the**

24 **hotel rental rates, correct?**

25 A Correct.

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1 MR. RUSSOMANNO: Okay. I have no further

2 questions. I really appreciate your time.

3 MR. RENGSTL: I just have two questions.

4 CROSS-EXAMINATION

5 BY MR. RENGSTL:

6 **Q Good afternoon, Carina. My name is Patrick**

7 **Rengstl. I represent Corus Construction Venture, a**

8 **defendant in the case. Have you had any discussions**

9 **either verbally or in writing with anyone at Corus**

10 **Construction Venture or Corus Bank about the project?**

11 A No.

12 **Q And how about any discussions with any buyers**

13 **of this project regarding Corus Bank or Corus**

14 **Construction Venture?**

15 A As far as -- no.

16 MR. RENGSTL: Okay. Nothing further.

17 MR. ALTSCHUL: If the transcript is ordered,

18 you'll have an opportunity to either read the

19 transcript or you can waive the reading of the

20 transcript. It will be up to you and your

21 attorney can help you with that decision on

22 whether to read or waive. But I have no further

23 questions at this time.

24 A Read what, what it's saying?

25 MR. CHARLIP: Yes. What the court reporter

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1 takes down. Okay. You can waive that right and

2 rely on the transcription itself to be accurate,

3 or you can ask to read the deposition of this

4 case.

5 You'll have to call them out --

6 THE COURT REPORTER: We'll contact you.

7 MR. CHARLIP: They'll contact you and you

8 have to read it. And at that point, if -- perhaps

9 you understand what you said, you can change the

10 words and things like that.

11 A Okay. She's going to send me that via mail?

12 THE COURT REPORTER: We'll call you and then

13 we can schedule something. If they want to do it

14 by e-mail, they can do that.

15 MR. CHARLIP: Yeah. You'll have to go there

16 to -- her office generally.

17 THE COURT REPORTER: Generally, sometimes

18 they can do it but we'll contact you first.

19 A Okay.

20 THE COURT REPORTER: So, are you guys going

21 to order this?

22 MR. ALTSCHUL: I'll let you know.

23 THE COURT REPORTER: Okay.

24 (Deposition concluded at 3:50 p.m.)

25 (Reading and signing of the deposition by the

93

1 witness has been reserved.)

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1 DATE: January 31, 2014
 2 TO: Carina Radonich
 C/O David Charlip, Esq.
 3 Charlip Law Group, LC
 17501 Biscayne Boulevard, Suite 510
 4 Aventura, Florida 33160-4806
 IN RE: Matthew Abercrombie, et al. v. SB Hotel
 5 Associates, LLC; Bayrock Group, LLC; et al. 08-060702
 CACE (07) 09-01853 CACE (07)
 6
 Dear Ms. Radonich,
 7
 Please take notice that on June 3, 2013, you gave
 8 your deposition in the above-referenced matter. At
 that time, you did not waive signature. It is now
 9 necessary that you sign your deposition. You may do so
 by contacting your own attorney or the attorney who
 10 took your deposition and make an appointment to do so
 at their office. You may also contact our office at
 11 the below number, Monday - Friday, 9:00 AM - 5:00 PM,
 for further information and assistance.
 12
 If you do not read and sign your deposition within
 13 thirty (30) days, the original, which has already been
 forwarded to the ordering attorney, may be filed with
 14 the Clerk of the Court. If you wish to waive your
 signature, sign your name in the blank at the bottom of
 15 this letter and promptly return it to us.
 16 Very truly yours,
 17
 18 JESSICA COOPER
 Universal Court Reporting
 19 (954)712-2600
 20 I do hereby waive my signature.
 21
 22 _____
 23 Carina Radonich
 24 cc: via transcript: Joseph E. Altschul, Esq.
 Herman J. Russomanno III, Esq.
 25 Patrick J. Rengstl, Esq.

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1 CERTIFICATE OF REPORTER
 2 STATE OF FLORIDA
 COUNTY OF BROWARD
 3
 I, JESSICA COOPER, Court Reporter and Notary
 4 Public for the State of Florida, do hereby certify that
 I was authorized to and did digitally report the
 5 deposition of CARINA RADONICH; the foregoing testimony
 was taken before me; that a review of the transcript
 6 was requested; and that the transcript is a true and
 complete record of my digital notes.
 7
 I further certify that I am not a relative,
 8 employee, attorney or counsel of any of the parties,
 nor am I a relative or employee any of the parties'
 9 attorney or counsel connected with the action, nor am I
 financially interested in the action.
 10
 Dated this 3rd day of June, 2013.
 11
 12 _____
 13 JESSICA COOPER
 14 NOTARY PUBLIC, STATE OF FLORIDA
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25

96

1 CERTIFICATE OF OATH
 2 STATE OF FLORIDA
 COUNTY OF BROWARD
 3
 I, JESSICA COOPER, the undersigned authority,
 4 certify that CARINA RADONICH personally appeared before
 me and was duly sworn.
 5
 Witness my hand and official seal this 3rd day of
 6 June, 2013.
 7
 8
 9 _____
 10 JESSICA COOPER, COURT REPORTER
 NOTARY PUBLIC, STATE OF FLORIDA
 COMMISSION NO.: EE 153401
 COMMISSION EXPIRATION: 12/15/15
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1 CERTIFICATE OF TRANSCRIBER
 2 STATE OF FLORIDA
 COUNTY OF BROWARD
 3
 I, CHYNNA BARBOSA, Transcriptionist and Notary Public
 4 for the State of Florida, do hereby certify that I was
 authorized to and did transcribe, to the best of my
 5 ability, the audio recording of the deposition of
 CARINA RADONICH, as provided by digital court reporter
 6 JESSICA COOPER, in the case of MATTHEW ABERCROMBIE, ET
 AL. v. SB HOTEL ASSOCIATES, LLC, ET AL., pending in the
 7 Circuit Court of the 17th Judicial Circuit in and for
 Broward County, Florida, Case No. 08-060702 CACE 07
 8 consolidated with 09-01853 CACE 07, and that the
 transcript and forgoing pages, numbered 1 to 97
 9 inclusive, constitute a true and correct transcription
 of the audio in said deposition.
 10
 WITNESS my hand and official seal in the City of Fort
 11 Lauderdale, County of Broward, State of Florida, this
 30th day of January, 2014
 12
 13
 14 _____
 15 CHYNNA BARBOSA, Transcriptionist
 Notary Public, State of Florida
 16 Commission No.: EE869302
 Commission Expiration: 01/28/2017
 17
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1 ERRATA SHEET
2 I wish to make the following changes, for the following
reasons:
3 PAGE NO. LINE NO.
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5 REASON _____
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